

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
ROBERT CLARKE,	:	VIOLATIONS:
a/k/a "Junior Brown"	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a "Tiger,"	:	controlled substances - 2 counts)
WILLIAM JACKSON,	:	18 U.S.C. § 922(g)(5) (possession of
a/k/a "Natty,"	:	firearms by an illegal alien - 1 count)
a/k/a "Dread,"	:	8 U.S.C. § 1326(a) (illegal re-entry after
NATASHA BLALOCK,	:	deportation - 1 count)
a/k/a "Tasha"	:	Notice of additional factors
	:	Notice of prior convictions

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about June 2003 to on or about June 16, 2004, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

ROBERT CLARKE,
a/k/a "Junior Brown"
a/k/a "Tiger,"
WILLIAM JACKSON,
a/k/a "Natty"
a/k/a "Dread,"
NATASHA BLALOCK,
a/k/a "Tasha,"

conspired and agreed with each other, and with others known and unknown, to distribute and to possess with intent to distribute a Schedule I controlled substance, that is, approximately 80 kilograms of marijuana.

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that defendant ROBERT CLARKE was the leader and organizer of a narcotics distribution enterprise that trafficked in both the wholesale and retail marijuana market in Philadelphia, Pennsylvania.

It was further part of the conspiracy that:

3. Defendant ROBERT CLARKE obtained marijuana from multiple sources, known and unknown to the grand jury, in Jamaica, Florida, Arizona, and elsewhere.

4. Defendant ROBERT CLARKE stored supplies of marijuana in various rented locations, known as “stash houses,” in Philadelphia, for which he employed people to protect the drugs maintained there.

5. Defendant ROBERT CLARKE distributed this marijuana to both wholesale distributors and customers.

6. Defendant ROBERT CLARKE met with distributors, customers, and other co-conspirators, at bars, nightclubs, and other public venues, for the purpose of distributing marijuana.

7. Defendant WILLIAM JACKSON served as ROBERT CLARKE’s chief distributor, occasional supplier, and “right-hand man” in overseeing the distribution and sales of marijuana.

8. Defendant NATASHA BLALOCK distributed marijuana, forwarded telephone messages to and from ROBERT CLARKE, received and deposited drug proceeds,

rented the organization's stash house in her name, and provided counter-surveillance for CLARKE's distributions of marijuana and other controlled substances.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following overt acts, among others, were performed by at least one member of the conspiracy, in Philadelphia, in the Eastern District of Pennsylvania:

1. On or about July 9, 2003, defendant ROBERT CLARKE sold to a person known to the grand jury approximately one pound of marijuana, in exchange for \$750, in Philadelphia.

2. On or about December 16, 2003, defendant ROBERT CLARKE sold to a person known to the grand jury approximately one pound of marijuana, in exchange for \$1,400, in Philadelphia.

3. On or about February 27, 2004, defendant ROBERT CLARKE sold to a person known to the grand jury approximately one pound of marijuana, in exchange for \$1,200, in Philadelphia.

4. On or about March 18, 2004, ROBERT CLARKE called NATASHA BLALOCK, to discuss the distribution of drugs and movement of drug money. BLALOCK asked CLARKE if BLALOCK should return money to the bank, and CLARKE advised that she should not, and further advised that he had just distributed drugs, which he called "food," to two customers.

5. On or about March 23, 2004, defendant ROBERT CLARKE met with a person known to the grand jury, and discussed the proposed sale of one pound of marijuana, in Philadelphia.

6. On or about April 16, 2004, defendants ROBERT CLARKE, NATASHA BLALOCK, and WILLIAM JACKSON discussed the distribution of controlled substances, and the collection of \$25,000 in drug proceeds.

7. On or about April 28, 2004, defendant ROBERT CLARKE told defendant NATASHA BLALOCK that a drug customer was going to pay CLARKE another \$2,000, and that CLARKE would give the money to BLALOCK for her to put in the bank.

8. On or about May 3, 2004, defendants ROBERT CLARKE and WILLIAM JACKSON discussed the pending distribution of a quantity of marijuana.

9. On or about May 18, 2004, defendant ROBERT CLARKE asked defendant WILLIAM JACKSON to assist CLARKE with transporting and distributing drugs at a bar in Philadelphia, which JACKSON agreed to do.

10. On or about May 28, 2004, defendant NATASHA BLALOCK warned defendant ROBERT CLARKE of police activity in the area of the organization's stash house.

11. On or about June 10, 2004, defendant NATASHA BLALOCK asked defendant ROBERT CLARKE for prices of controlled substances, which CLARKE then quoted to BLALOCK.

12. On or about June 16, 2004, defendant ROBERT CLARKE possessed approximately 59 grams of marijuana, packaged in 27 separate bags at a stash house located at

4825 North Camac Street, Apartment 302, in Philadelphia, which stash house was being guarded by two people who worked for CLARKE.

13. On or about June 16, 2004, defendants ROBERT CLARKE and WILLIAM JACKSON discussed the arrest of two co-conspirators at a stash house where the two co-conspirators resided, and the need to be wary of law enforcement.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in or about June 2003 to on or about June 16, 2004, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

ROBERT CLARKE,
a/k/a "Junior Brown"
a/k/a "Tiger,"

conspired and agreed with others known and unknown to the grand jury, to distribute and to possess with intent to distribute a Schedule II controlled substance, that is, 500 grams or more of a mixture or substance containing a detectable amount of cocaine, that is, approximately 550 grams of cocaine.

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that defendant ROBERT CLARKE was the leader and organizer of a narcotics distribution enterprise that trafficked in both the wholesale and retail cocaine market in Philadelphia, Pennsylvania.

It was further part of the conspiracy that:

3. Defendant ROBERT CLARKE obtained cocaine from multiple sources, known and unknown to the grand jury, in Jamaica, Florida, and elsewhere.

4. Defendant ROBERT CLARKE distributed this cocaine to both wholesale distributors and customers.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the following overt acts, among others, were performed by at least one member of the conspiracy, in Philadelphia, in the Eastern District of Pennsylvania:

1. On or about July 17, 2003, defendant ROBERT CLARKE agreed to sell to a person known to the grand jury approximately two ounces, that is approximately 57 grams of cocaine, in exchange for \$1,900, in Philadelphia, while commenting that one kilogram of cocaine only costs between \$6,000 and \$7,000 in Jamaica.

2. On or about August 6, 2003, defendant ROBERT CLARKE sold to a person known to the grand jury approximately 4 ½ ounces, that is, approximately 128 grams of cocaine, in exchange for \$3,300, in Philadelphia.

3. On or about September 22, 2003, defendant ROBERT CLARKE sold to a person known to the grand jury approximately 4 ½ ounces, that is, approximately 128 grams of cocaine, in exchange for \$3,600, in Philadelphia.

4. On or about November 18, 2003, defendant ROBERT CLARKE discussed with a person known to the grand jury the sale of approximately three ounces, that is, approximately 85 grams of cocaine, in Philadelphia.

5. On or about November 19, 2003, defendant ROBERT CLARKE sold to a person known to the grand jury approximately two ounces, that is, approximately 56 grams of cocaine, in exchange for \$1,700, in Philadelphia.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 29, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ROBERT CLARKE,
a/k/a "Junior Brown"
a/k/a "Tiger,"**

while being an illegal alien and unlawfully in the United States, knowingly possessed, in and
affecting interstate commerce, firearms, that is, a loaded Charter Arms Bulldog .44 revolver,
serial number 520847, a loaded Tanfoglio Model EA380 .380 caliber semi-automatic handgun,
and a loaded Davis Model P-380 .380 caliber semi-automatic handgun.

In violation of Title 18, United States Code, Section 922(g)(5).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 29, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ROBERT CLARKE,
a/k/a "Junior Brown"
a/k/a "Tiger,"**

an alien and subject of Jamaica, who had previously been deported from the United States on or about July 11, 2000, was found in the United States, having knowingly and unlawfully re-entered the United States without first applying to the Attorney General of the United States or his successor, the Secretary for Homeland Security (Title 6, United States Code, Sections 202(3), (4) and 557), for permission to reapply for admission, and without receiving in response the express consent of the Attorney General or his successor to reapply for admission.

In violation of Title 8, United States Code, Section 1326(a).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this indictment:

a. defendants **ROBERT CLARKE, a/k/a “Junior Brown,” a/k/a “Tiger,” WILLIAM JACKSON, a/k/a “Natty,” a/k/a “Dread,” and NATASHA BLALOCK, a/k/a “Tasha,”** committed an offense and relevant conduct involving at least 80 kilograms, but less than 100 kilograms, of marijuana, as described in U.S.S.G. § 2D1.1(a)(3).

b. defendant **ROBERT CLARKE, a/k/a “Junior Brown,” a/k/a “Tiger,”** possessed a dangerous weapon, that is, a firearm, as described in U.S.S.G. § 2D1.1(b)(1).

c. defendant **ROBERT CLARKE, a/k/a “Junior Brown,” a/k/a “Tiger,”** was an organizer and leader of criminal activity that involved five or more participants, and was otherwise extensive, as described in to U.S.S.G. § 3B1.1.

2. In committing the offense charged in Count Two of this indictment, defendant **ROBERT CLARKE, a/k/a “Junior Brown,” a/k/a “Tiger,”** committed an offense and relevant conduct involving 500 grams or more of cocaine, as described in U.S.S.G. § 2D1.1(c)(7).

NOTICE OF PRIOR CONVICTIONS

Notice is hereby given that, on or about March 31, 1994, and on or about June 8, 1995, the defendant

**ROBERT CLARKE,
a/k/a "Junior Brown"
a/k/a "Tiger,"**

was convicted in the Commonwealth of Pennsylvania of simple possession of a controlled substance, to wit, marijuana, for which misdemeanor offenses he was sentenced to terms of probation.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**